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22 REPRO MEDIA and ARNO RUBEN
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24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

26 LEE LAHTINEN in his capacity as Trustee
27 of the SAN FRANCISCO
28 LITHOGRAPHERS PENSION TRUST,

Plaintiff,

v.

REPRO MEDIA, a California Corporation;
ARNO RUBEN, individually and doing
business as REPRO MEDIA; ARNO
RUBEN, individually,

Defendants.

Case No. C 06 4047 (MEJ)

**STIPULATION AND [PROPOSED]
ORDER CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE AND
RELATED DEADLINES**

[L.R. 6-2]

Judge: Honorable Maria Elena James
Ctrm: B, 15th Floor

1 Plaintiff Lee Lahtinen, in his capacity as Trustee of the San Francisco Lithographers
 2 Pension Trust ("Plaintiff"), and Defendants Repro Media, a California Corporation, Arno Ruben,
 3 individually and doing business as Repro Media, and Arno Ruben, individually ("Defendants"),
 4 through their respective counsel, hereby stipulate and request that the Court order that the Initial
 5 Case Management Conference and related deadlines be continued for approximately three months.

6 1. Pursuant to the Court's Order Setting Initial Case Management Conference
 7 and ADR Deadlines, the Initial Case Management Conference in this action is set for September 28,
 8 2006 at 10:00 a.m. Other case management deadlines, including the filing of the ADR Certification,
 9 completion of initial disclosures, and filing of the Case Management Statement, precede and are set
 10 in relation to the Case Management Conference.

11 2. Defendants have only just recently appeared in the action, having filed their
 12 Answer to Complaint for Withdrawal Liability on August 29, 2006.

13 3. The parties wish to explore a possible resolution of this action without the
 14 necessity of further litigation time and expense. To that end, Defendants have informally requested
 15 certain information from Plaintiff. Plaintiff is currently in the process of reviewing Defendant's
 16 request and is amenable to exchanging relevant information as part of the exploration of settlement.
 17 The parties currently anticipate that a short extension of case management deadlines will enable
 18 them to focus their efforts on resolving this matter.

19 4. There have been no previous time modifications related to the Initial Case
 20 Management Conference or related case management activities in this case.

21 5. The parties expect that the requested extension of the date for the Initial Case
 22 Management Conference will have no adverse effect on the schedule for the case. No trial date or
 23 other deadlines have yet been set. The requested extension may facilitate the resolution of the
 24 parties' dispute, and will at a minimum enable the parties to exchange information about their
 25 respective positions that may streamline case management.

26 6. Counsel for the parties would be available for a case management conference
 27 on December 14, 2006 or December 21, 2006.

1 Therefore, Plaintiff and Defendants, through their respective counsel, stipulate and
2 agree as follows:

3 1. The Initial Case Management Conference date of September 28, 2006 and
4 related deadlines are vacated.

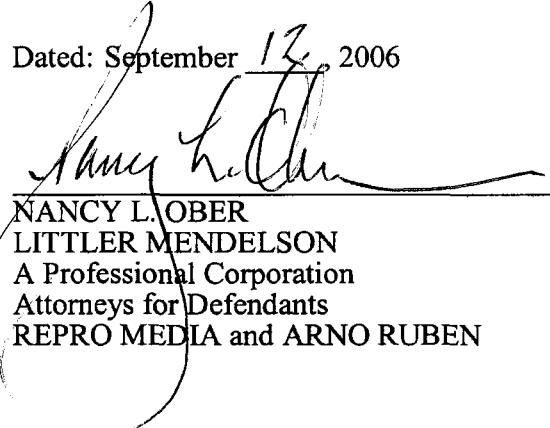
5 2. The Initial Case Management Conference date is extended to December 14,
6 2006 at 10 a.m.

7 3. Related deadlines for ADR and case management activities are extended
8 accordingly, as provided in the Court's Order Setting Initial Case Management Conference and ADR
9 Deadlines.

10 Dated: September 12, 2006

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12 LINDA BALDWIN JONES
13 WEINBERG, ROGER & ROSENFELD
14 A Professional Corporation
15 Attorneys for Plaintiff
16 LEE LAHTINEN IN HIS CAPACITY AS
TRUSTEE OF THE SAN FRANCISCO
LITHOGRAPHERS PENSION TRUST

17 Dated: September 13, 2006

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19 NANCY L. OBER
20 LITTLER MENDELSON
21 A Professional Corporation
22 Attorneys for Defendants
23 REPRO MEDIA and ARNO RUBEN
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2 **ORDER**

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4 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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6 Dated: September 25, 2006

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